

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JAMES HAYDEN,	)	Case No. 1:17-cv-02635
	)	
Plaintiff,	)	Judge Christopher A. Boyko
	)	
vs.	)	
	)	
2K GAMES, INC. and TAKE-TWO	)	
INTERACTIVE SOFTWARE, INC.,	)	
	)	
Defendants.	)	

**MOTION TO SEAL PLAINTIFF’S REPLY BRIEF IN SUPPORT OF  
PLAINTIFF’S MOTION TO EXCLUDE OR STRIKE DEFENDANTS’  
UNTIMELY AND IMPROPER REPLY EXPERT REPORTS**

In accordance with Local Rule 5.2 and the Court’s Protective Order (Dkt. # 32), Plaintiff James Hayden (“Hayden”) hereby moves for leave to file under seal an unredacted version of his Reply Brief In Support of Plaintiff’s Motion to Exclude or Strike Defendants’ Supplemental Expert Reports (“Reply”) and the exhibits thereto. Hayden has redacted from his Reply information that was marked confidential by the parties, pursuant to the Protective Order entered in this case. Dkt. # 32. Additionally, Hayden has redacted deposition testimony that has been designated confidential under the Protective Order. To maintain the confidentiality of that information, therefore, Hayden filed a public version of the Reply that has the designated-as-confidential information redacted and hereby seeks leave by this motion to file the unredacted version under seal.

Hayden has served Defendants with the unredacted version of the Reply and will file under seal the unredacted version when the Court grants this motion or as otherwise directed by the Court.

Dated: September 20, 2021

Respectfully submitted,

By: /s/ Andrew Alexander

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 20, 2021, a copy of the foregoing was filed electronically. Notice of this filing was sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt, and parties may access this filing through the Court's system.

/s/ Andrew Alexander

One of the attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JAMES HAYDEN,	)	Case No. 1:17-cv-02635
	)	
Plaintiff,	)	Judge Christopher A. Boyko
	)	
vs.	)	
	)	<b>ORDER GRANTING PLAINTIFF’S</b>
2K GAMES, INC. and TAKE-TWO	)	<b>MOTION TO SEAL</b>
INTERACTIVE SOFTWARE, INC.,	)	
	)	
Defendants.	)	

Before the Court is Plaintiff James Hayden’s Motion to Seal. After careful consideration, the Court concludes that the Motion should be, and hereby is **GRANTED**.

It is therefore ORDERED that Plaintiff’s Reply Brief in Support of Plaintiff’s Motion to Exclude or Strike Defendants’ Untimely and Improper Reply Expert Reports and exhibits thereto shall be filed under seal.

Dated:

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HON. CHRISTOPHER A. BOYKO  
United States District Court Judge